



U.S. Department of Justice

United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

October 16, 2015

**BY ECF**

The Honorable Paul A. Crotty  
United States District Judge  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

Re: *American Civil Liberties Union v. United States Department of  
Health and Human Services, et al.*, No. 15 Civ. 2645 (PAC)

Dear Judge Crotty:

The parties respectfully submit this letter jointly in accordance with Your Honor's Order dated July 29, 2015, directing the parties to file a status report letter in the above-referenced action brought pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552.

The Government and the ACLU have been working diligently to resolve this action. The Government completed its production of responsive documents on October 1, 2015, and the ACLU is currently reviewing the production to determine whether it objects to any redactions or withholdings made in the production. The parties anticipate being in a position to either stipulate to dismissal of the case or to schedule dates for motion practice, including with respect to attorneys' fees, in 30 days. Accordingly, we respectfully propose that the parties submit a second status report letter on November 16, 2015.

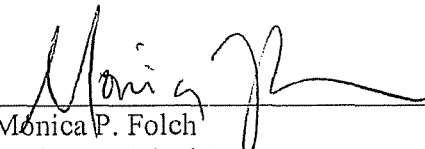
We thank the Court for its consideration of this matter.

Respectfully,


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United States Attorney

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